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1 Alper  
2 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF PENNSYLVANIA  
3 -----x  
3

4 FREE SPEECH COALITION, INC. et  
4 al.,

5  
5 Plaintiffs,

6 v. No. 09-4607

7 THE HONORABLE ERIC H. HOLDER,

8 Defendant.  
9  
9 -----x

10  
10 March 14, 2013  
11 12:40 p.m.  
12  
13

14 Deposition of BARBARA ALPER, taken by  
15 Defendant, at the United States Attorney's  
16 Office, One St. Andrew's Plaza, New York, New  
17 York, before Samuel G. Mauro, Jr., a Registered  
18 Merit Reporter and Notary Public of the State of  
19 New York.  
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22

1 Alper

2 Q. Have you taken any photographs of  
3 sexually explicit conduct since 1995?

4 A. Yes.

5 Q. Could you describe that?

6 A. I have photographed -- well, do we  
7 want to --

8 MS. BAUMGARDNER: Whoever she's going  
9 to identify in terms of the personal photograph  
10 she has taken, because I think your question may  
11 elicit protected information pursuant to our  
12 agreed protective order, at this point I'm going  
13 to ask Cara to leave the room so Ms. Alper can  
14 give her answer.

15 MS. GAGLIANO: OK.

16 (Ms. Gagliano not present)

17 A. I have photographed myself and my  
18 husband.

19 Q. When did you do that?

20 A. I have done it over the last few  
21 years.

22 Q. Starting when?

23 A. Five years ago, four years ago.

24 Q. How many times have you taken such  
25 photographs?

Alper

CERTIFICATE

STATE OF NEW YORK )  
: Ss  
COUNTY OF NEW YORK)

I, Samuel Mauro, Jr., a Registered  
Merit Reporter and Notary Public within and for  
the State of New York, do hereby certify:

That BARBARA ALPER, the witness whose  
deposition is hereinbefore set forth, was duly  
sworn by me and that such deposition is a true  
record of the testimony given by such witness.

I further certify that I am not  
related to any of the parties to this action by  
blood or marriage and that I am in no way  
interested in the outcome of this matter.

In witness whereof, I have hereunto  
set my hand this \_\_\_\_\_ day of  
\_\_\_\_\_ 2\_\_\_\_.

\_\_\_\_\_  
SAMUEL G. MAURO, RMR